

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In Re:

TOWN SPORTS INTERNATIONAL, LLC, et
al.,¹

Debtors.

Chapter 11

Case No. 20-12168-CSS

(Jointly Administered)

Objections due by: October 27, 2020

Hearing Date: November 3, 2020

**NOTICE OF MOTION OF JAMES KOLE (Claim Number: 0000020036) FOR RELIEF FROM
STAY UNDER SECTION 362 OF THE BANKRUPTCY CODE**

TO: Young Conaway Stargatt & Taylor, LLP
Rodney Square, 1000 North King Street
Wilmington, DE 19801
Attn: Sean Greecher, Esq.
Allison S. Mielke, Esq.
Debtors' Counsel (Proposed)

Cole Schotz P.C.
500 Delaware Avenue Suite 1410
Wilmington, DE 19801
Attn: Justin R. Alberto, Esq.
Counsel for Debtors (Proposed)

Office of the United States Trustee
844 King Street, Suite 2207
Lockbox 35
Wilmington, DE, 19801
Attn: David Buchbinder

FILED
2020 OCT 16 AM 11:34
CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

JAMES KOLE (Claim Number: 0000020036) has filed a Motion for Relief from Stay which seeks the following relief: permission to proceed with the pending personal injury action in the state court of New

¹ The last four digits of Town Sports International, LLC's federal tax identification number are 7365. The mailing address for Town Sports International, LLC is 399 Executive Boulevard, Elmsford, New York 10523. Due to the large number of debtors in these cases, for which the Debtors have requested joint administration, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://dm.epiq11.com/TownSports>, or by contacting the proposed undersigned counsel for the Debtors.

Jersey titled Kole v. TSI HOBOKEN NORTH, LLC d/b/a NEW YORK SPORTS CLUB, BER-L-8112-19 against debtor TSI HOBOKEN NORTH, LLC, subject to any terms or conditions this Court may impose.

HEARING ON THE MOTION WILL BE HELD ON NOVEMBER 3, 2020, at 12:00 PM

You are required to file a response (and the supporting documentation required by Local Rule 4001-1(c)) to the attached motion at least seven days before the above hearing date.

At the same time, you must also serve a copy of the response upon the movant who is filing this application pro se:

James Kole
300 Coles Street, apt 1704
Jersey City, NJ 07310
(201)452-5333

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

By: _____

JAMES KOLE

Dated: October 14, 2020

CERTIFICATE OF SERVICE

I, JAMES KOLE , certify that I am not less than 18 years of age, and that service this notice of motion and a copy of the motion was made on October 14, 2020, upon:

U.S. Bankruptcy Court
824 N. Market Street, Third Floor
Wilmington, DE 19801
By overnight delivery

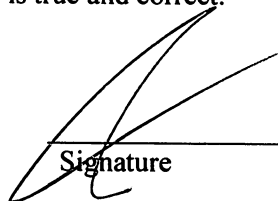
Young Conaway Stargatt & Taylor, LLP
Rodney Square, 1000 North King Street
Wilmington, DE 19801
Attn: Sean Greecher, Esq.
Allison S. Mielke, Esq.
Debtors' Counsel (Proposed) by regular mail

Cole Schotz P.C.
500 Delaware Avenue Suite 1410
Wilmington, DE 19801
Attn: Justin R. Alberto, Esq.
Counsel for Debtors (Proposed) by regular mail

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Lockbox 35
Wilmington, DE, 19801
Attn: David Buchbinder
By regular mail

Under penalty of perjury, I declare that the foregoing is true and correct.

10/14/2020
Date


Signature